

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)
JOANN INC., et al.,) Chapter 11
Debtors.)
) Case No. 25-10068 (CTG)
)
) (Jointly Administered)
)
) Re: Docket Nos. 14,113 & 225
)
) Obj. Deadline: 2/4/25 at 4:00 p.m.
) Hearing Date: 2/11/25 at 2:00 p.m.
)

JOINDER OF CERTAIN FIRSTENERGY OPERATING COMPANIES TO THE
OBJECTION OF CERTAIN UTILITY COMPANIES TO THE MOTION OF DEBTORS
FOR ENTRY OF INTERIM AND FINAL ORDERS (I) APPROVING THE DEBTORS'
PROPOSED ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE UTILITY
SERVICES, (II) APPROVING THE DEBTORS' PROPOSED PROCEDURES FOR
RESOLVING ADEQUATE ASSURANCE REQUESTS, (III) PROHIBITING UTILITY
PROVIDERS FROM ALTERING, REFUSING, OR DISCONTINUING SERVICE,
(IV) AUTHORIZING CERTAIN FEE PAYMENTS FOR PREPETITION SERVICES
PERFORMED, AND (V) GRANTING RELATED RELIEF

Ohio Edison Company ("Ohio Edison"), Potomac Edison Company
("PE"), West Penn Power Company ("WPP"), Pennsylvania Electric
Company ("Penelec"), Monongahela Power Company ("Mon Power"),
Metropolitan Edison Company ("Met-Ed"), Pennsylvania Power
Company ("Penn Power"), Jersey Central Power & Light Company
("JCP&L"), Toledo Edison Company ("TE") and The Cleveland
Electric Illuminating Company ("CEI") (collectively, the "Joinder
Utilities"), by counsel, hereby join in the *Objection of Certain
Utility Companies To the Motion of Debtors For Entry of Interim
and Final Orders (I) Approving the Debtors' Proposed Adequate
Assurance of Payment For Future Utility Services, (II) Approving*

the Debtors' Proposed Procedures For Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments For Prepetition Services Performed, and (V) Granting Related Relief (the "Objection") Docket No. 225), and set forth the following:

Introduction

1. The Joinder Utilities adopt and incorporate by reference herein the *Introduction* section set forth in the Objection.

Facts

2. The Joinder Utilities adopt and incorporate by reference herein the *Facts* section set forth in the Objection.

3. The Debtors propose that the Bank Account will contain the following on behalf of the Joinder Utilities: (a) Ohio Edison - \$51,045.15; (b) PE - \$3,440.93; (c) WPP - \$3,600.45; (d) Penelec - \$1,927.92; (e) Mon Power - \$425.90; (f) Met-Ed - \$2,603.59; (g) Penn Power - \$1,523.07; (h) JCP&L - \$4,131.05; (i) TE - \$1,991.41; and (j) CEI - \$4,268.63.

Facts Regarding the Utilities Section

4. The Joinder Utilities adopt and incorporate by reference herein the *Facts Regarding the Utilities* section set forth in the Objection because the billing and payment terms set forth in that section are essentially the same as to the Joinder

Utilities.

5. In order to avoid the need to bring witnesses and have lengthy testimony regarding the Joinder Utilities' regulated billing cycles, the Joinder Utilities request that this Court, pursuant to Rule 201 of the Federal Rules of Evidence, take judicial notice of their billing cycles. Pursuant to the foregoing request and based on the voluminous size of the applicable documents, the Joinder Utilities are providing the web site links to the following tariffs and/or state laws, regulations and/or ordinances:

CEI, Ohio Edison and TE:

https://www.firstenergycorp.com/content/customer/customer_choice/ohio/ohio_tariffs.html

Mon Power:

https://www.firstenergycorp.com/customer_choice/west_virginia/west_virginia_tariffs.html

Met-Ed, Penelec, WPP and Penn Power:

https://www.firstenergycorp.com/content/customer/customer_choice/pennsylvania/pennsylvania_tariffs.html

Potomac Edison:

Maryland -

https://www.firstenergycorp.com/content/customer/customer_choice/maryland/maryland_tariffs.html

JCP&L:

https://www.firstenergycorp.com/content/customer/customer_choice/new_jersey/new_jersey_tariffs.html

6. Subject to a reservation of the Joinder Utilities' right to supplement their post-petition deposit requests if additional accounts belonging to the Debtors are subsequently

identified, the Joinder Utilities' estimated prepetition debt and post-petition deposit requests are as follows:

<u>Utility</u>	<u>No. of Accts.</u>	<u>Est. Prepet. Debt</u>	<u>Dep. Request</u>
Ohio Edison	16	\$98,148.83	\$98,446 (2-month)
PE	4	\$7,688.14	\$13,680 (2-month)
WPP	5	\$5,934.56	\$14,836 (2-month)
Penelec	6	\$12,638.71	\$19,154 (2-month)
Mon Power	1	\$513.66	\$2,418 (2-month)
Met-Ed	4	\$6,205.86	\$10,554 (2-month)
Penn Power	2	\$4,334.68	\$1,082 (2-month)
JCP&L	4	\$7,651.89	\$17,098 (2-month)
TE	3	\$4,342.14	\$4,836 (2-month)
CEI	4	\$8,877.55	\$9,614 (2-month)

7. Penelec held a prepetition cash deposit in the amount of \$2,582 that it recouped against prepetition debt pursuant to Section 366(c)(4) of the Bankruptcy Code. No prepetition deposit amount remains after recoupment.

8. Penn Power held a prepetition cash deposit in the amount of \$314 that it recouped against prepetition debt pursuant to Section 366(c)(4) of the Bankruptcy Code. No prepetition deposit amount remains after recoupment.

Discussion

9. The Joinder Utilities incorporate and adopt by reference the legal and factual arguments set forth in the

Objection.

WHEREFORE, the Joinder Utilities respectfully request that this Court enter an order:

1. Denying the Utility Motion as to the Joinder Utilities;
2. Awarding the Joinder Utilities the post-petition adequate assurance of payment pursuant to Section 366 in the amounts and forms satisfactory to the Joinder Utilities; and
3. Providing such other and further relief as the Court deems just and appropriate.

Dated: January 31, 2025

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